

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS LUCA, JR., individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WYNDHAM HOTEL GROUP, LLC and
WYNDHAM HOTELS & RESORTS, LLC,

Defendants.

Case No. 16-cv-746-MRH

Electronically Filed and Served

JOINT STATUS REPORT

Pursuant to the Court's March 30, 2019 Order, ECF No. 178, Plaintiff Thomas Luca, Jr. and Defendants Wyndham Hotel Group, LLC and Wyndham Hotels and Resorts, LLC respectfully submit this joint status report.

On March 29, 2019, the parties advised the Court that they reached an agreement in principle to resolve plaintiff's claims and those of the proposed class. Since that time, Defendants have been working to finalize certain portions of the parties' agreement. The parties expect to complete their remaining discussions within the next 30 days. Accordingly, on or before May 29, 2019, the parties anticipate filing preliminary approval papers for the settlement.

Dated: April 29, 2019

Respectfully submitted,

David A. Strassburger (Pa. I.D. #76027)
STRASSBURGER MCKENNA
GUTNICK & GEFSKY
444 Liberty Avenue, Suite 2200
Pittsburgh, PA 15222
Telephone: (412) 281-5423
dstrassburger@smgglaw.com

/s/ K. Winn Allen

K. Winn Allen (admitted *pro hac vice*)
Ronald K. Anguas, Jr. (admitted *pro hac vice*)
Zachary A. Avallone (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
655 Fifteenth Street NW
Washington, DC 20005
Telephone: (202) 879-5000
winn.allen@kirkland.com

Counsel for Defendants Wyndham Hotels & Resorts, LLC and Wyndham Hotel Group, LLC

By: /s/ Gary F. Lynch

Gary F. Lynch
glynch@carlsonlynch.com
Jamisen A. Etzel
jetzel@carlsonlynch.com
CARLSON LYNCH, LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
T: (412) 322-9243
F: (412) 231-0246

Joseph P. Guglielmo
Erin Green Comite
Carey Alexander
**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
T: (212) 223-6444
F: (212) 223-6334
jguglielmo@scott-scott.com
ecomite@scott-scott.com
calexander@scott-scott.com

Counsel for Plaintiff Thomas Luca, Jr.

CERTIFICATE OF SERVICE

I certify that on April 29, 2019, I electronically filed the foregoing with the Clerk of this Court by using the CM/ECF system, which will accomplish service through the Notice of Electronic Filing for parties and attorneys who are Filing Users.

/s/ K. Winn Allen

K. Winn Allen

Counsel for Defendants